

1 Michael W. Sobol (SBN 194857)
msobol@lchb.com
2 David T. Rudolph (SBN 233457)
drudolph@lchb.com
3 Jallé H. Dafa (SBN 290637)
jdafa@lchb.com
4 John D. Maher (SBN 316157)
jmaher@lchb.com
5 Nabila Abdallah (SBN 347764)
nabdallah@lchb.com
6 Amelia A. Haselkorn (SBN 339633)
ahaselkorn@lchb.com
7 LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP
275 Battery Street, 29th Floor
8 San Francisco, CA 94111
Telephone: 415.956.1000
9 Facsimile: 415.956.1008

10 *Oracle's counsel on signature page*

11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

14 Michael Katz-Lacabe and Dr. Jennifer
15 Golbeck, on behalf of themselves and all
others similarly situated,

16 Plaintiffs,

17 vs.

18 ORACLE AMERICA, INC., a corporation
19 organized under the laws of the State of
Delaware,

20 Defendant.
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Case No. 3:22-cv-04792-RS

**JOINT STIPULATION AND ORDER TO
STAY DISCOVERY AND VACATE CASE
DEADLINES**

Judge: Hon. Richard Seeborg
Dept: Courtroom: 3

Date Action Filed: August 19, 2022
Trial Date: None set

1 Pursuant to Civil Local Rules 7-12 and 6-2, Plaintiffs and Defendant Oracle America Inc.
2 (“Oracle”) (collectively, the “Parties”), by and through their respective counsel of record, hereby
3 stipulate as follows:

4 WHEREAS, on April 24, 2024, the Parties attended an arms-length mediation with a third-
5 party neutral and have thereafter continued negotiations with the third-party neutral’s assistance;

6 WHEREAS, the Parties have now reached a classwide settlement in principle, subject to
7 the approval of the Court;

8 WHEREAS, staying discovery in this matter and vacating all existing deadlines will
9 preserve judicial resources and allow the Parties to focus their efforts on finalizing the settlement;

10 WHEREAS, the proposed stay will not prejudice any party and will serve the interests of
11 judicial economy;

12 NOW, THEREFORE, subject to the approval of the Court, it is hereby stipulated and
13 agreed that:

14 1. All existing hearings and case deadlines are vacated, including those concerning
15 Plaintiffs’ motion to certify interlocutory appeal (Dkt. No. 120), but without prejudice to
16 Plaintiffs renewing that motion should the prospective settlement not be approved;

17 2. The Parties anticipate they will finalize and execute a full-form settlement
18 agreement on or before July 8, 2024;

19 3. Plaintiffs will file a motion for preliminary settlement approval promptly after the
20 execution of a settlement agreement.

1 Dated: May 9, 2024

/s/ Michael W. Sobol

Michael W. Sobol (SBN 194857)

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ahaselkorn@lchb.com

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

275 Battery Street, 29th Floor

San Francisco, CA 94111-3339

Telephone: 415.956.1000

Facsimile: 415.956.1008

Attorneys for Plaintiffs and the Class

13 Dated: May 9, 2024

/s/ Tiffany Cheung

Tiffany Cheung (CA SBN 211497)

TCheung@mofo.com

Christin Hill (CA SBN 247522)

CHill@mofo.com

MORRISON & FOERSTER LLP

425 Market Street

San Francisco, California 94105

Telephone: 415.268.7000

Facsimile: 415.268.7522

Purvi G. Patel (CA SBN 270702)

PPatel@mofo.com

Whitney O'Byrne (CA SBN 325698)

WOByrne@mofo.com

Erik Manukyan (CA SBN 340307)

EManukyan@mofo.com

Emma Burgoon (CA SBN 348097)

EBurgoon@mofo.com

MORRISON & FOERSTER LLP

707 Wilshire Boulevard, Suite 6000

Los Angeles, California 90017

Telephone: 213.892.5200

Facsimile: 213.892.5454

Zachary S. Newman (NY SBN 5651518)
Admitted *pro hac vice*
ZNewman@mofo.com
MORRISON & FOERSTER LLP
250 West 55th Street
New York, New York 10019-9601
Telephone: 212.468.8000
Facsimile: 212.468.7900

Kyle Zipes (CA SBN 251814)
Kyle.Zipes@oracle.com
Nargues M. Eder (CA SBN 260289)
Nargues.M.Eder@oracle.com
ORACLE AMERICA, INC.
500 Oracle Parkway
Redwood Shores, California 94065
Telephone: 650.506.7000

Attorneys for Defendant Oracle America, Inc.

Pursuant to stipulation, **IT IS SO ORDERED.**

Dated: 5/10/2024



Honorable Richard Seeborg
United States District Court Judge